

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2022 MAR -1 PM 12:17

UNITED STATES OF AMERICA

DEPUTY CLERK MS

v.

No.

VIAJE DEMITRI VAUGHN (1)
LOUIS CHARLES WASHINGTON III (2)

3 - 22 CR 0094 - X

INDICTMENT

The Grand Jury Charges:

Count One

False Statement During the Purchase of a Firearm; aiding and abetting
(18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2)

On or about September 16, 2020, in the Dallas Division of the Northern District of Texas, the defendants, **Viaje Vaughn** and **Louis Washington III**, aided and abetted by each other, in connection with the acquisition of a firearm, a Glock 9mm pistol, model 19x, serial number BPTC575, from Targetmaster, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Targetmaster, which statement was intended and likely to deceive Targetmaster, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant, **Louis Washington**, aided and abetted by **Viaje Vaughn**, represented that he (**Washington**) was the actual transferee and buyer when in fact he was not.

In violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2.

Count Two

False Statement During the Purchase of a Firearm; aiding and abetting
(18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2)

On or about April 19, 2021, in the Dallas Division of the Northern District of Texas, the defendants, **Viaje Vaughn** and **Louis Washington III**, aided and abetted by each other, in connection with the acquisition of a firearm, a Glock 9mm pistol, model 19x, serial number BPEF066, from The Gun Zone, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to The Gun Zone, which statement was intended and likely to deceive The Gun Zone, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant, **Louis Washington**, aided and abetted by **Viaje Vaughn**, represented that he (**Washington**) was the actual transferee and buyer when in fact he was not.

In violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2.

Count Three

False Statement During the Purchase of a Firearm; aiding and abetting
(18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2)

On or about August 12, 2021, in the Dallas Division of the Northern District of Texas, the defendants, **Viaje Vaughn** and **Louis Washington III**, aided and abetted by each other, in connection with the acquisition of a firearm, a Glock 10mm pistol, model 29Gen4, serial number BTST204, from The Gun Zone, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to The Gun Zone, which statement was intended and likely to deceive The Gun Zone, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant, **Louis Washington**, aided and abetted by **Viaje Vaughn**, represented that he (**Washington**) was the actual transferee and buyer when in fact he was not.

In violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2.

Count Four

False Statement During the Purchase of a Firearm; aiding and abetting
(18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2)

On or about August 20, 2021, in the Dallas Division of the Northern District of Texas, the defendants, **Viaje Vaughn** and **Louis Washington III**, aided and abetted by each other, in connection with the acquisition of a firearm, a Glock 9mm pistol, model 19x, serial number BUCD095, from Targetmaster, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Targetmaster, which statement was intended and likely to deceive Targetmaster, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant, **Louis Washington**, aided and abetted by **Viaje Vaughn**, represented that he (**Washington**) was the actual transferee and buyer when in fact he was not.

In violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2.

Count Five

False Statement During the Purchase of a Firearm; aiding and abetting
(18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2)

On or about October 2, 2021, in the Dallas Division of the Northern District of Texas, the defendants, **Viaje Vaughn** and **Louis Washington III**, aided and abetted by each other, in connection with the acquisition of a firearm, a Glock .40cal pistol, model 27Gen3, serial number ABPF898, from The Gun Zone, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to The Gun Zone, which statement was intended and likely to deceive The Gun Zone, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant, **Louis Washington**, aided and abetted by **Viaje Vaughn**, represented that he (**Washington**) was the actual transferee and buyer when in fact he was not.

In violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2.

Count Six

False Statement During the Purchase of a Firearm; aiding and abetting
(18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2)

On or about October 2, 2021, in the Dallas Division of the Northern District of Texas, the defendants, **Viaje Vaughn** and **Louis Washington III**, aided and abetted by each other, in connection with the acquisition of a firearm, a Glock 9mm pistol, model 26Gen3, serial number AGB5666, from The Gun Zone, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to The Gun Zone, which statement was intended and likely to deceive The Gun Zone, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant, **Louis Washington**, aided and abetted by **Viaje Vaughn**, represented that he (**Washington**) was the actual transferee and buyer when in fact he was not.

In violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2.

Count Seven

False Statement During the Purchase of a Firearm; aiding and abetting
(18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2)

On or about October 3, 2021, in the Dallas Division of the Northern District of Texas, the defendants, **Viaje Vaughn** and **Louis Washington III**, aided and abetted by each other, in connection with the acquisition of a firearm, a Glock .45cal pistol, model 36, serial number BTYX683, from The Gun Zone, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to The Gun Zone, which statement was intended and likely to deceive The Gun Zone, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant, **Louis Washington**, aided and abetted by **Viaje Vaughn**, represented that he (**Washington**) was the actual transferee and buyer when in fact he was not.

In violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2.

Count Eight

False Statement During the Purchase of a Firearm; aiding and abetting
(18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2)

On or about October 3, 2021, in the Dallas Division of the Northern District of Texas, the defendants, **Viaje Vaughn** and **Louis Washington III**, aided and abetted by each other, in connection with the acquisition of a firearm, a Glock .357 caliber pistol, model 32, serial number BPFA923, from The Gun Zone, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to The Gun Zone, which statement was intended and likely to deceive The Gun Zone, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant, **Louis Washington**, aided and abetted by **Viaje Vaughn**, represented that he (**Washington**) was the actual transferee and buyer when in fact he was not.

In violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2.

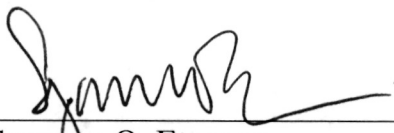
Forfeiture Notice
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

Upon conviction of any of the offenses alleged in this indictment, and under 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), defendants, **Viaje Vaughn** and **Louis Washington III**, shall forfeit to the United States of America all firearms and ammunition involved in or used in the knowing commission of the offenses.

A TRUE BILL:


FOREPERSON

CHAD E. MEACHAM
UNITED STATES ATTORNEY


Suzanna O. Etessam
Assistant United States Attorney
Texas State Bar No. 17572420
1100 Commerce Street, Third Floor
Dallas, Texas 75242
Telephone: 214.659.8600
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THE UNITED STATES OF AMERICA

v.

VIAJE DEMITRI VAUGHN (1)
LOUIS CHARLES WASHINGTON, III (2)

INDICTMENT

18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2
False Statement During the Purchase of a Firearm;
Aiding and Abetting
(Counts 1 -8)

18 U.S.C. § 924(d) and 28 U.S.C. § 246(c)
Forfeiture Notice

8 Counts

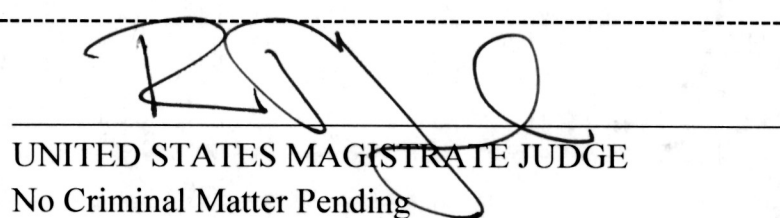
A true bill rendered

DALLAS


FOREPERSON

Filed in open court this 1st day of March, 2022.

**Warrant to be Issued for both defendants: Viaje Demitri Vaughn (1) and also for:
Louis Charles Washington, III (2)**


UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending